

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:12-cv-043-MHS
)	
CANON INC., and)	JURY TRIAL DEMANDED
CANON U.S.A., INC.,)	
)	
Defendants.)	
)	

**DEFENDANT CANON U.S.A., INC.'S MOTION TO EXTEND THE DEADLINE TO
FILE A MOTION TO TRANSFER ON CONSENT**

Defendant Canon U.S.A. Inc. ("Canon U.S.A.") respectfully moves the Court for a five day extension of the June 20, 2012 deadline to file a motion to transfer this action to another Court, to and including June 25, 2012. The above-captioned case is the most recent case brought by GeoTag, and unlike other defendants, Canon U.S.A. does not have the same long history with this matter as other defendants who have been before this Court for years. Indeed, Canon U.S.A. was just recently served in this action on March 8, 2012 and just recently filed its Answer and Counterclaims on May 30, 2012. Canon Inc. has not yet been served in this action.

Canon U.S.A. requests this extension solely to allow it time to evaluate any potential motion to transfer. This proposed extension is not for the purposes of delay, and will not affect any other deadlines in this case. Plaintiff GeoTag has also consented to this brief extension of the current deadline.

Dated: June 20, 2012

Respectfully submitted,

/s/ Kimberly A. Warshawsky

Mary-Olga Lovett
lovettm@gtlaw.com
State Bar No. 00789289
GREENBERG TRAURIG, LLP
1000 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: 713-374-3541
Facsimile: 713-374-3505

Michael A. Nicodema (*pro hac vice*)
Attorney in Charge
nicodemam@gtlaw.com
GREENBERG TRAURIG, LLP
200 Park Avenue
PO Box 677
Florham Park, New Jersey 07932
Telephone: 973-360-7900
Facsimile: 973-301-8410

Jim DeCarlo (*pro hac vice* app. forthcoming)
decarloj@gtlaw.com
Jonathan Dunsay (*pro hac vice* app. forthcoming)
dunsayj@gtlaw.com
GREENBERG TRAURIG, LLP
MetLife Building
200 Park Avenue
New York, New York 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400

Kimberly A. Warshawsky
warshawskyk@gtlaw.com
GREENBERG TRAURIG, LLP
2375 East Camelback Road, Suite 700
Phoenix, Arizona 85016
Telephone: 602-445-8000
Facsimile: 602-445-8100

ATTORNEYS FOR DEFENDANT
CANON U.S.A., INC.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies (1) that Canon U.S.A. has complied with the meet and confer requirement in Local Rule CV-7(h) by conferring with opposing counsel on June 20, 2012 regarding the relief sought by this motion; and (2) Plaintiff GeoTag has consented to this motion.

/s/ Kimberly A. Warshawsky

Kimberly A. Warshawsky
Attorney for Canon U.S.A. Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 20, 2012. Any other counsel of record or parties will be served by facsimile transmission and/or first class mail this 30th day of May, 2012.

By: /s/ Kimberly A. Warshawsky